

m/023/016

DAQC -1451- 2004  
Site ID # N/A

MEMORANDUM

TO: **FILE - H.E. DAVIS CONSTRUCTION**

THROUGH: Jeff Dean, Compliance Manager

FROM: Jay Morris, Environmental Scientist

DATE: October 22, 2004

SUBJECT: **COMPLAINT INSPECTION, C, ATT, Juab County,**

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TYPE OF INSPECTION: Complaint - Partial

DATE OF INSPECTION: October 12, 2004

MULTIPLE INSPECTION SOURCE: No

FFY QUARTER ASSIGNED: N/A

SOURCE LOCATION: Chicken Creek Canyon, Levan, Juab County. From the main road in Levan, turn north on 1<sup>st</sup> south. 1<sup>st</sup> south ends where it intersects the chicken creek canyon road. Turn right at the intersection and travel up the canyon approximately 1/3 mile to the entrance of the quarry site.

SOURCE CONTACTS: Tony Christofferson

OPERATING STATUS: Haul trucks and loader were operating. Crushers and screens were not operating

PROCESS DESCRIPTION:

Gypsum material is mined from this location. Track hoe's equipped with breakers and drills prepare an area for blasting. After blasting, the material is pushed over a working face to a storage pile below. A front end loader feeds the material from the storage pile to the feed chain. Materials are conveyed from the feed chain, through a jaw crusher, screen and cone crusher. After sizing at the screen the materials are conveyed back through the crushing circuit or to one of two storage piles.

Water spray bars were attached to the jaw crusher and the cone crusher and there was a water truck on site for fugitive dust control.

APPLICABLE REGULATIONS: UAC R307-401-1 – Notice of Intent and Approval Order Requirements  
UAC R307-205-5 – Fugitive Emissions and Fugitive Dust From Mining Activities

SOURCE INSPECTION  
EVALUATION:

UAC R307-401-1

(1) Except for the exemptions listed in R307-413, any person intending to construct a new installation which will or might reasonably be expected to become a source or an indirect source of air pollution or to make modifications or relocate an existing installation which will or might reasonably be expected to increase the amount or change the effect of, or the character of, air contaminants discharged, so that such installation may be expected to become a source or indirect source of air pollution,

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or any person intending to install a control apparatus, or other equipment intended to control emission of air contaminants from a stationary source, shall submit to the executive secretary a notice of intent and receive an approval order prior to initiation of construction, modification or relocation. The notice of intent shall include the information described in R307-401-2 to determine whether the proposed construction, installation, modification, relocation or establishment will be in accord with applicable requirements of these rules. Within 30 days after receipt of a notice of intent, or any additional information necessary to the review, the executive secretary shall advise the applicant of any deficiency in the notice of intent or the information submitted. The executive secretary shall transmit to the Administrator, EPA, a copy of each notice of intent for each major source or major modification and provide notice to the Administrator, EPA, of every action related to the consideration of such permit.

**Status.**

**NOT IN COMPLIANCE.** H.E. Davis has not submitted an notice of intent and received an Approval Order for this site. Mr. Christofferson indicated that the facility may have been permitted previously and he was working on a new permit for the site. New Source Review records were checked and the DAQ has no record of a new NOI or a previous AO for this site.

UAC R307-205-5

(2) Any person who owns or operates a mining operation shall minimize fugitive dust as an integral part of site preparation, mining activities, and reclamation.

**Status.**

**NOT IN COMPLIANCE.** It did not appear that the company had taken any steps to minimize fugitive dust in the unpaved haul truck loading area. Materials being loaded were extremely dry and sent plumes of 80-100% opacity from the top of the haul trucks each time the loader was emptying its bucket. Opacity from the loader driving around the unpaved area was also observed at 80% and 85%.

The feeder, jaw crusher, screen, cone crusher and conveyors were not operating. I did observe a water hose and water sprays installed on the jaw and cone crushers. Photos are attached to this memo.

TITLE V SOURCE:

Cannot be determined at this time

EMISSION CAP  
AND EVALUATION:

N/A

EMISSION INVENTORY:

N/A

SOURCE INSPECTION  
SUMMARY EVALUATION:

The haul road and unpaved operational areas had not been watered and were extremely dusty when in use. The loader and haul trucks were traveling through 1-3 inches of fine powder in the unpaved areas. Haul truck drivers operate the loader.

The crushing equipment was not operating at the time of inspection. Mr. Christofferson indicated the crushing equipment has only been set up in the spring of 2004 and has not operated. A storage pile and aggregate materials on the crushing equipment indicate it has operated at this site. No record of an AO exists for this site. No NOI has been submitted for this site.

**Previous Enforcement Actions:**

There have not been any enforcement actions against H.E. Davis and sons in the previous 5 year period.



**Compliance Assistance:**

Mr. Christofferson was informed this site was not permitted and that the hauling operation was creating excessive fugitive dust in a telephone conversation on October 19, 2004.

**CURRENT  
RECOMMENDATIONS:**

Source should be issued a Compliance Advisory for failing to submit an NOI and receive an AO prior to set up and operation and for failing to minimize fugitive dust from the unpaved haul truck loading area and haul road.

**HIGH PRIORITY VIOLATOR:**

No.

**RECOMMENDATION FOR  
NEXT INSPECTION:**

Inspection should be assigned after an AO is received for this site.

**ATTACHMENTS:**

VEO form, Photos, Compliance Advisory Notice

**INSPECTORS SIGNATURE:**

A handwritten signature in dark ink, appearing to read "Jay S. Turner", is written over a horizontal line.